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Counsel for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,
Individual and Representative Plaintiffs,
v.
META PLATFORMS, INC., a Delaware
corporation;
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MICHELLE WOODHOUSE
IN SUPPORT OF ADMINISTRATIVE MOTION
TO FILE UNDER SEAL EXHIBITS TO
META'S OPPOSITION TO PLAINTIFFS'
ADMINISTRATIVE MOTION**

I, Michelle Woodhouse, hereby declare:

1. I am Associate General Counsel for Defendant, Meta Platforms, Inc. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I make this declaration in support of Meta's administrative motion to file under seal Exhibits C through F, H, and I to Meta's Opposition to Plaintiffs' Administrative Motion ("Meta's Letter Brief"). The motion seeks to have the following partially sealed or entirely sealed:

Document	Sealing Request
Exhibit C to Meta's Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit D to Meta's Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit E to Meta's Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit F to Meta's Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit H to Meta's Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit I to Meta's Letter Brief	<ul style="list-style-type: none"> Entire document

3. Exhibits C, D, F, and I are letters from counsel in this action regarding Meta's privilege log, which contain significant discussion and descriptions of Meta's highly confidential internal communications. Public disclosure of the letters exposes Meta to the risk of competitive harm.

4. Exhibits E and H are emails exchanged between counsel in this action regarding Meta's privilege logs. These emails describe Meta's highly confidential, privileged communications and documents. Public disclosure of the redacted portions of these emails exposes Meta to the risk of competitive harm.

5. Public disclosure of the information contained in the above-referenced exhibits exposes Meta to the risk of competitive and financial harm, by revealing Meta's non-public business strategies, financial information, and trade secret information pertaining to its generative

1 AI offerings.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct

4 Executed in San Jose, California on this 12th day of November, 2024.

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Michelle Woodhouse

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